## UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA BECKLEY

IN RE:

CRIMINAL COMPLAINT

CASE NO. 5:21-mj-00016

## SEALED MOTION TO SEAL CRIMINAL COMPLAINT AND ARREST WARRANT

Comes now the United States of America by Timothy D. Boggess,
Assistant United States Attorney for the Southern District of West
Virginia, and moves this Court to:

- 1. Order that the Criminal Complaint, and the Arrest Warrant, be filed under seal until further order of this Court. The foregoing documents should be filed under seal for the protection of the investigation and to prevent flight of targets of the investigation and the destruction of evidence.
- 2. There are no alternatives to sealing the entire Criminal Complaint, and the Arrest Warrant, because unsealing a redacted copy of the criminal complaint would reveal the existence of the ongoing investigation to targets who have the capacity both for flight and to destroy evidence.

3. Order that this Motion be sealed.

Respectfully submitted,

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